



Yuba County Water Agency

Resource Adequacy Enhancements

This template has been created for submission of stakeholder comments on the Resource Adequacy Enhancements fourth revised straw proposal that was published on March 17, 2020. The proposal, stakeholder meeting presentation, and other information related to this initiative may be found on the initiative webpage at:

<http://www.caiso.com/StakeholderProcesses/Resource-Adequacy-Enhancements>

Upon completion of this template, please submit it to initiativecomments@caiso.com. Submissions are requested by close of business on **April 7, 2020**.

Submitted by	Organization	Date Submitted
Mike Kline mkline@yubawater.org (530) 701-8479	Yuba County Water Agency (dba Yuba Water Agency)	May 12, 2020

Please provide your organization's overall position on the RA Enhancements fourth revised straw proposal:

- Support
- Support w/ caveats
- Oppose
- Oppose w/ caveats
- No position

Yuba Water Agency (YWA) appreciates the opportunity to provide comments to the CAISO's RA Enhancements Fourth Revised Straw Proposal. YWA realizes the submission date has passed. However, YWA would appreciate CAISO's consideration.

YWA owns and operates the Yuba River Development Project (YRDP). The key features being New Bullards Bar Reservoir (approximately 966,000 acre-feet of storage) and Colgate Powerhouse (340 MW). This project also includes the Narrows 2 Powerhouse (55 MW) downstream which provides a relatively stable base flow that is varied periodically to meet environmental requirements and irrigation water delivery obligations. The YRDP plays a significant role in managing flood risk, in coordination with DWR and other State and local Agencies. YWA also owns and operates the Narrows 1 Project (12 MW) under a separate FERC license. The key missions of the Agency are Flood Risk Reduction, Water Delivery, Hydrogeneration, Fisheries Enhancement and Recreation.

Please provide your organization's comments on the following issues and questions.

1. System Resource Adequacy

Please provide your organization's feedback on the System Resource Adequacy topic as described in section 4.1. Please explain your rationale and include examples if applicable.

- a. Please provide your organization's feedback on the System RA Showings and Sufficiency Testing topic as described in section 4.1.1. Please explain your rationale and include examples if applicable.

No comments.

- b. Please provide your organization's feedback on the Planned Outage Process Enhancements topic as described in section 4.1.2. Please explain your rationale and include examples if applicable.

YWA appreciates the challenges explained by the CAISO, to assure needed RA is identified with a high degree of certainty, such that the capacity will be available when needed.

Planned Outage Process Option 1: Option 1 does raise a significant issue for YWA. It is appreciated that off-peak and short duration outages would be allowed June 1 through October 31, but the inability to take longer outages in September and October is concerning. Consistently, the Narrows 2, and one of the two Colgate units undergo several weeks each of necessary annual maintenance outages during September and October respectively. This schedule is the optimum opportunity based on watershed hydrology, storage including managing a flood reservation, environmental considerations, water deliveries, and maximizing hydro energy output. YWA has utilized the September and October outage window for over three decades. Additional detail about the use of this maintenance window for the YRDP follows.

September and October are consistently the lowest flow periods within the Yuba watershed. If YWA were to move the September through October maintenance outages to off-peak months when the likelihood of precipitation events and flows are higher (November through the following May), there would be an increase in spill events and lost generation.

The availability of the Colgate units early winter through spring supports flood risk reduction, which is the highest priority mission of YWA. During wet years, it would not be desirable to schedule a maintenance outage in the winter-early spring portion of the off-peak period, such that the amount of water that could be drafted from New Bullards Bar Reservoir would be limited due to an outage and create a greater risk of flood pool encroachment or flooding.

The lower flows during September and October also support anadromous salmonid spawning in the Lower Yuba River, which aligns with the current September-October outages. Central Valley spring-run Chinook salmon, which have been listed as Threatened under the federal and California Endangered

Species Acts (ESA) since 1999, spawn from September 1st through the end of November in the lower Yuba River, and fall-run Chinook salmon spawn there from October 1st through the end of January. Annual maintenance inspections and outages at Narrows 2 are scheduled when instream minimum flow requirements are lowest, in September and October. In September and October the low flows can be provided via the Narrows 1 facility, with a hydraulic capacity of approximately 750 cfs. Scheduling the lowest flows of the year during the onset of spawning allows YWA to only ratchet flows up during higher demand or higher flow periods, increasing stage and eliminating the risk of dewatering redds.

Planned Outage Process Option 2: YWA is interested in seeing further development of a potential RA Replacement Market facilitated by CAISO.

Planned to Forced Outage Reporting: YWA appreciates CAISO's initiative to provide further tariff clarification regarding the Planned to Forced Outage concerns. YWA has had situations where equipment is becoming marginal or approaching failure but always attempts to wait until a scheduled Planned Outage. If however the Planned outage is cancelled, YWA has found it necessary to take the outage as forced. Additionally, a concern that is probably not unique to YWA is the need to arrange for specialized equipment, equipment representatives or consultant/third party support for certain maintenance activities during a Planned outage. Often that support must be scheduled well in advance, and cancellation of the Planned Outage may result in deferral of needed repairs and/or equipment performance improvements for months or longer, with potential cost or reliability impacts.

YWA does recognize the CAISO's reliability requirements, and urges further development of a system for outage scheduling, cancellations, and exceptions that will balance CAISO and unit reliability needs.

UCAP Accounting: YWA has no concerns at this time, regarding transitioning from NQC to UCAP for RA procurement accounting.

- i. Please provide your organization's feedback on when bids should be submitted and how and when they could be changed under Option 2: CAISO procures all planned outage substitution capacity, and what are the implications of doing so under any proposed option.

No comments.

- ii. Please provide your organization's feedback on whether or not the Planned Outage Substitution Capacity Bulletin Board is necessary and, if so, why given the effort to develop and maintain.

No comments.

- c. Please provide your organization's feedback on the RA Import Provisions topic as described in section 4.1.3. Please explain your rationale and include examples if applicable.

No comments.

2. Backstop Capacity Procurement Provisions

Please provide your organization's feedback on the Backstop Capacity Procurement Provisions topic as described in section 4.2. Please explain your rationale and include examples if applicable.

No comments.

- a. Please provide your organization's feedback on the Capacity Procurement Mechanism Modifications topic as described in section 4.2.1. Please explain your rationale and include examples if applicable.
- b. Please provide your organization's feedback on the Making UCAP Designations topic as described in section 4.2.2. Please explain your rationale and include examples if applicable.
- c. Please provide your organization's feedback on the Reliability Must-Run Modifications topic as described in section 4.2.3. Please explain your rationale and include examples if applicable.
 - i. Please provide your organization's feedback on an appropriate availability incentive design to apply to RMR resources after the removal of the RAIM tool.
- d. Please provide your organization's feedback on the UCAP Deficiency Tool topic as described in section 4.2.4. Please explain your rationale and include examples if applicable.

3. Please provide your organization's feedback on the implementation plan, including the proposed phases, the order these policies must roll out, and the feasibility of the

proposed implementation schedule, as described in section 5. Please explain your rationale and include examples if applicable.

[No comments.](#)

4. Please provide your organization's feedback on the proposed decisional classification for this initiative as described in section 6. Please explain your rationale and include examples if applicable.

[No comments.](#)

Additional comments

Please offer any other feedback your organization would like to provide on the Resource Adequacy Enhancements fourth revised straw proposal.

[No comments.](#)